

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2011

Docket No. N2012-1

**OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO NATIONAL NEWSPAPER ASSOCIATION INTERROGATORIES
(NNA/USPS-T1-12 AND 13)**

The United States Postal Service hereby files this objection to the above-identified interrogatories of the National Newspaper Association filed on February 23, 2012. The interrogatories are stated verbatim and followed by a statement of the basis for the objections.

NNA/USPS T1-12

Please confirm that to comply with the Postal Accountability and Enhancement Act of 2006, USPS retained IBM as a consultant to study service standard compliance for Within County and that a report resulting from such study was supplied to the Postal Regulatory Commission. If you do not confirm, please explain why. If you do confirm, please identify the docket number and date of the filing of such report.

The Postal Service objects to this interrogatory as an effort to compel the production of information irrelevant to the issues raised by the request in the instant docket and to shift the burden to the Postal Service of searching for materials purportedly filed in another Commission docket. The solution to NNA's quest for a copy of a document it believes was publicly filed with the Commission is to search the publicly accessible records of the Commission. Insofar as the interrogatory seeks confirmation that the Postal Accountability and Enhancement Act required the Postal Service to retain a consulting firm to produce a study of the subject matter described in the question (rather than permitting it to conduct

such a study internally), the Postal Service further objects to the question as calling for the statement of a legal conclusion, rather than requesting factual information.

NNA/USPS T10-13

Please confirm that USPS conducts no separate studies of service standard compliance for Within County Periodicals mail but instead uses Outside County Periodicals mail data as a proxy.

The Postal Service objects to this interrogatory as an effort to use the availability of intervenor discovery in the current docket to compensate for the absence of intervenor discovery in Docket No. ACR2011-1. In the latter docket, such matters as market dominant product service performance and measurement are issues under review. However, parties there are required to submit pertinent questions to the Commission and request that it exercise its discretion to direct them to the Postal Service for response. The fact that service standard changes are under review in the instant docket does bring within its scope such matters as the intricacies and mechanics of Periodicals service performance measurement. Nor does the risk that the Commission might exercise its discretion in Docket No. ACR2011-1 not to request answers to particular intervenor questions entitle parties to use discovery in Docket No. N2012-1 to seek answers to those questions.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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